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Attorney for Defendant Han Nam Corporation

IN THE UNITED STATES DISTRICT COURT  
FOR THE  
NORTHERN MARIANA ISLANDS

ZHAI LAN JIANG,

Plaintiff,

-v-

HAN NAM CORPORATION,

Defendant.

CIVIL ACTION NO. CV-07-0035

DEFENDANT'S CASE MANAGEMENT  
CONFERENCE STATEMENT

COMES NOW, Han Nam Corporation, defendant in the above entitled action, by and through its undersigned counsel, to provide the following Case Management Conference Statement:

- a. All parties have been duly served.
- b. This Court has jurisdiction over this case pursuant to 42 U.S.C. § 2000e-5 and 42 U.S.C. § 1981a(a)(1) and 28 U.S.C. §1331 (Federal Question Jurisdiction) and 28 U.S.C. §1337(a) (Proceedings arising under any act of Congress regulating commerce) and supplemental jurisdiction over claims for breach of contract raised within the complaint and venue is properly set in this jurisdiction.

- 1 c. Defendant anticipates filing motions as follows:
- 2 1. Motion for summary judgment or partial summary judgment pursuant to
- 3 Rule 56 of the Federal Rules of Civil Procedure;
- 4 2. Motion to exclude documents related to EEOC investigation, findings
- 5 and correspondence related to settlement discussions entered therein.
- 6 d. Defendant does not anticipate any special procedures required.
- 7 e. No modifications of standard pretrial procedures are necessary.
- 8 f. Settlement prospects are unknown.
- 9 g. Defendant recommends that this case be scheduled on an regular track pursuant
- 10 to LR16.2CJ(c).
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14 DATED this 3<sup>rd</sup> day of January, 2008.

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18 STEPHEN J. NUTTING

19 Attorney for Defendant

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